

Qs and As from Federal Agencies on Federal Agency Certification Plans

Question 1: EPA is deliberating FIFRA 24(c) state-specific labelling of pesticides, specifically more-restrictive labelling vs. additional uses [see, for example: [[HYPERLINK "https://www.dtnpf.com/agriculture/web/ag/crops/article/2018/11/01/state-restrictions-federal-pesticide" \] \] \]. How does EPA intend to apply label requirements to multi-state applications of 24\(c\) products by Federal agency employees, who are certified by their agency, on Federal lands?](https://www.dtnpf.com/agriculture/web/ag/crops/article/2018/11/01/state-restrictions-federal-pesticide)

Ex. 5 Deliberative Process (DP)

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Question 2: In States that certify “commercial” applicators of “general use” and “restricted use” pesticide, will a Federal agency certification for RUP suffice for applications of both “general use” and “restricted use” pesticide?

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Question 3: If Federal employee is certified by his/her agency for a period of 4 years, but neighboring State uses 2-year certification periods, will Federal employee need to be recertified more frequently than each 4 years?

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Question 4: Does EPA consider any State/Tribal “licensing” requirements for pesticide applicators to be “substantive” standards in regard to qualifications for commercial applicator certification that exceed the USDA/FS certification plan standards?

Ex. 5 Deliberative Process (DP)

Question 5: USDA has certified applicators applying RUPs in States X and Y. States X and Y have a reciprocal agreement. If USDA certifies an applicator based on State X's certification, is the USDA employee certification valid in States X and Y?

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